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MICHIGAN DEPARTMENT OF NATURAL RESOURCES

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JAN 20 1981

INTEROFFICE COMMUNICATION

Janaury 13, 1981

PTE. MOULLEE S.G.A.

TO: Roy Schrameck

FROM: Karl Zollner, Jr. *KZ*

SUBJECT: Pennwalt Corporation

US EPA RECORDS CENTER REGION 5



402910

The intent of the following memorandum is to provide a file documentation of the notes I took Friday, January 9, 1981, meeting regarding the Pennwalt Corporation. You and I were both in attendance at that meeting. Also in attendance were Mr. Zugger, Mr. Batchelor and Ms. Harris of the Environmental Enforcement Division and Mr. Courchaine, Mr. Baldwin, Mr. Ross, Ms. Dixon and Mr. Bek of the Water Quality Division

Since the last meeting staff had regarding this matter, it has been determined that there are promulgated BPT guidelines for pH for this particular industrial category. You argued that those guidelines for pH limits (6.0-9.0) were limits for analyses of grab samples, not continuous monitoring samples. This was the whole purpose of EPA coming up with those new limits for continuous pH monitoring situations.

You indicated that multi-stage feed neutralization and a diversion system is what EPA has determined is BPT. The Company has installed a multi-stage feed neutralization system, but does not have room, because of physical constraints, for a diversion system for all of their outfalls.

You indicated you would evaluate the Company's past pH data to attempt to show that our proposed pH range limits would be more restritive on the Pennwalt Corporation than EPA's proposed limits for continuous pH monitoring would be. It was indicated that we should state clearly in the Order that in our judgment, that the pH treatment technology installed by the Company is the equivalent of BPT.

There was much discussion as to whether we should only issue the Order at this time or should issue both the Order and a reissued NPDES permit. If we do not reissue the permit, the current permit will remain in full force and effect except that compliance with certain sections of the Order should be indicated to also constitute compliance with corresponding sections of the permit. The consensus seemed to be that the permit should not be reissued until after EPA promulgates their final guidelines for pH where pH is continuously monitored.

There was also considerable discussion as to whether or not to take this issue to the Water Resources Commission at this month's meeting. It was decided that a briefing will be made to the Commission on the uniqueness of the pH limits in the proposed Order and asking them to approve the public noticing of the Order. After you complete your review of the pH treatment technology, we are to inform the Company that the permit remains in effect since we have an application on hand for permit reissuance. That letter should probably point out to the Company what the proposed EPA pH limits will require.

clp
cc: P. Zugger